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January 27, 2022

VIA ECF

Hon. Ronnie Abrams, U.S.D.J.
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Henry v. Fox News Network LLC et al.*
Case No. 21-cv-07299-RA-GWG

Dear Judge Abrams,

We represent plaintiff Edward Henry (“Plaintiff”) in connection with the above-captioned matter. We write to the Court now pursuant to Section 3 of Your Honor’s Individual Rules (“Rules”) and in response to defendants’ renewed application for a stay filed on January 25, 2022 following the filing of the Amended Complaint. (ECF 81.)

Pursuant to Section 3 of Your Honor’s Rules, we telephoned Chambers earlier today to advise that a responsive letter will be forthcoming. However, we do wish to note that contrary to Your Honor’s requirement, defendants failed to “first confer in good-faith with [Plaintiff’s counsel], in person or by telephone, in an effort to resolve the dispute” prior to filing their application. Rules, §3. And, despite that defendants’ “letter **must** include a representation that the meet-and-confer process occurred and was unsuccessful,” it does not. *Id.* (emphasis added.)

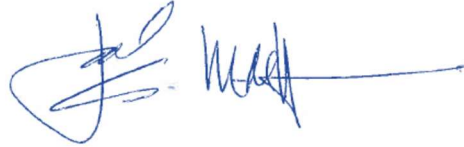
While this office has since communicated with defendants’ counsel concerning its refusal to abide by the Rules, defendants maintain that they had no obligation to meet-and-confer under the circumstances. Plaintiff disagrees. Nevertheless, while we maintain that defendants’ application for a stay is, as will be shown, without merit in view of the strength of the allegations as pled in the Amended Complaint, we do ask that we be provided until next Tuesday, February 1, 2022, by which to submit our response.

Hon. Ronnie Abrams, U.S.D.J.
January 27, 2022
Page 2 of 2

MB MANDELBAUM
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We appreciate the Court's consideration of this request.

Respectfully submitted,

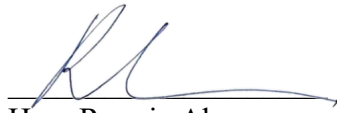
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Joel G. MacMull

cc: All counsel of Record (*via ECF only*)

Application granted.

SO ORDERED.

A handwritten signature in blue ink, appearing to read 'Ronnie Abrams', with a long horizontal stroke extending to the right.

Hon. Ronnie Abrams
01/28/22